

## PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3298



March 21, 2013

Bret Lane, Senior Vice-President  
Southern California Gas Company  
Gas Operations and System Integrity  
555 W. Fifth Street, GT21C3  
Los Angeles, CA 90013

GA2012-34

**SUBJECT: General Order (GO) 112-E Audit of Southern California Gas Company's  
(SoCalGas) South Inland Distribution**

Dear Mr. Lane:

The staff of the Safety and Enforcement Division (SED), formerly called the Consumer Protection and Safety Division, of the California Public Utilities Commission conducted a GO 112-E audit of SoCalGas' South Inland Distribution Region (Region) from October 8 – 19, 2012. The inspection included a review of your Operation and Maintenance records and field activities in the Azusa, Corona, Ramona, Riverside and San Bernardino Districts for the period within November 2011 – October 2012. SED staff also reviewed SoCalGas' operator qualification records and included field observations of randomly selected individuals performing covered tasks. SED's findings are noted in the "Summary of Inspection Findings" (Summary).

Within 30 days of your receipt of this letter, please provide a written response indicating the measures taken by SoCalGas to address the probable violations noted in the Summary. Pursuant to Commission Resolution ALJ-274, SED staff has the authority to issue citations for each violation found during the audit. SED will notify SoCalGas of the enforcement action it plans to take after it reviews SoCalGas' audit response.

If you have any questions, please contact Adriana Crasnean at (213) 620-2598.

Sincerely,

A handwritten signature in cursive script, appearing to read "Michael Robertson".

Michael Robertson, P.E.  
Program Manager  
Gas Safety and Reliability Branch  
Safety and Enforcement Division

cc: Jerry Palo Jr., SED/GSRB  
Adriana Crasnean, SED/GSRB  
Michelle Wong, SED/GSRB

## Summary of Audit Findings & Observations

### GO 112-E inspection of Southern California Gas Company South Inland Distribution Region October 8 – 19, 2012

#### Findings

**1. Title 49 Code of Federal Regulations (CFR) §192.605 – Procedural manual for operations, maintenance, and emergencies.**

*§192.605(a)...Each operator shall prepare and follow for each pipeline, a manual of written procedures for conducting operations and maintenance activities and for emergency response. For transmission lines, the manual must also include procedures for handling abnormal operations. This manual must be reviewed and updated by the operator at intervals not exceeding 15 months, but at least once each calendar year. This manual must be prepared before operations of a pipeline system commence. Appropriate parts of the manual must be kept at locations where operations and maintenance activities are conducted.*

Per SoCalGas procedures 189.005, Section 3.3.2.3 requires recording of the instrument used during odorization test on SoCalGas Form 3991 "Odor Intensity Report." However, Work Order #520000342781 and #520000373136 completed by two technicians of the Chino District did not identify which equipment was used during the tests for odor intensity. SoCalGas Form 3991 was not used as required by SoCalGas Procedure 189.005. Therefore, the Region is in violation of GO 112-E, Reference Title 49 CFR §192.605(a).

**2. Title 49 Code of Federal Regulations (CFR) §192.805 – Qualification program**

*§192.805(b)...Ensure through evaluation that individuals performing covered tasks are qualified;*

SoCalGas' Pipeline Valve Inspection records showed two non-qualified individuals completing two work orders for valve inspections. These two work orders were WO#520000251844 for valve #41163-13 and WO#520000341508 for valve #41-13-5. The Region was not able to provide their qualifications for this covered task and the work orders were completed and approved by these two individuals. Although the Region's timesheets demonstrated that another qualified individual was at the approximate locations at the time of the inspections, the signees of the work orders are still considered responsible for the covered tasks. Therefore, the Region is in violation of GO 112-E, Reference Title 49 CFR §192.805.

#### Observation

There were 18 odorization test records, out of 44 reviewed, that did not indicate the address for the test location. Even though the test points are configured differently from regular meter set assemblies and easily identified by the qualified individuals, the street address should be included in the records to avoid any confusion.